

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 6:23-614

-versus-

ESTEBAN COLON PACHECO
WILLIAM JOSE MANUEL CASTILLO
ELIZABETH DELZO JARAMILLO
CHRISTIAN VALENTIN CRUZ
WILMARI RODRIGUEZ GONZALEZ

) 21 U.S.C. § 846
) 21 U.S.C. § 841(a)(1)
) 21 U.S.C. § 841(b)(1)(A)
) 21 U.S.C. § 841(b)(1)(C)
) 18 U.S.C. § 922(o)
) 18 U.S.C. § 921(a)
) 18 U.S.C. § 924(a)(2)
) 18 U.S.C. § 2
) 26 U.S.C. § 5845(b)
) 18 U.S.C. § 924(c)(1)(A)
) 18 U.S.C. § 924(c)(1)(B)(ii)
) 18 U.S.C. § 922(a)(6)
) 26 U.S.C. § 5841
) 26 U.S.C. § 5861(d)
) 26 U.S.C. § 5871
) 18 U.S.C. § 924(d)(1)
) 21 U.S.C. § 853
) 21 U.S.C. § 881
) 26 U.S.C. § 5872
) 49 U.S.C. § 80303
) 28 U.S.C. § 2461(c)

SEALED
INDICTMENT

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COUNT 1

THE GRAND JURY CHARGES:

Beginning at a time unknown to the Grand Jury, but beginning in at least early 2022, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, ESTEBAN COLON PACHECO, WILLIAM JOSE MANUEL CASTILLO, ELIZABETH DELZO JARAMILLO, CHRISTIAN VALENTIN CRUZ, and WILMARI RODRIGUEZ GONZALEZ, knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and with others, both known and unknown to

the Grand Jury, to possess with intent to distribute and to distribute cocaine and methamphetamine, both Schedule II controlled substances;

- a. With respect to ESTEBAN COLON PACHECO, the amount involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him is 50 grams or more of methamphetamine and a quantity of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- b. With respect to WILLIAM JOSE MANUEL CASTILLO, the amount involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him is 50 grams or more of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- c. With respect to ELIZABETH DELZO JARAMILLO, the amount involved in the conspiracy attributable to her as a result of her own conduct and the conduct of other conspirators reasonably foreseeable to her is 50 grams or more of methamphetamine and a quantity of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- d. With respect to CHRISTIAN VALENTIN CRUZ, the amount involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him is a quantity of methamphetamine and a quantity of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);
- e. With respect to WILMARI RODRIGUEZ GONZALEZ, the amount involved in the conspiracy attributable to her as a result of her own conduct and the conduct of other

conspirators reasonably foreseeable to her is a quantity of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);

All in violation of Title 21, United States Code, Section 846.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

On or about November 22, 2022, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

On or about November 22, 2022, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, knowingly did possess a machinegun, that is, a fully automatic Glock 23, .40 caliber pistol;

In violation of Title 18, United States Code, Sections 922(o), 921(a), and 924(a)(2), and Title 26, United States Code, Section 5845(b).

COUNT 4

THE GRAND JURY FURTHER CHARGES:

On or about November 22, 2022, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, knowingly possessed a firearm, which is a machinegun, in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Sections 924(c)(1)(B)(ii) and 921(a), and Title 26, United States Code, Section 5845(b).

COUNT 5

THE GRAND JURY FURTHER CHARGES:

That on or about December 5, 2022, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

THE GRAND JURY FURTHER CHARGES:

That on or about December 5, 2022, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, knowingly did possess a machinegun, that is, a fully automatic Glock 23, .40 caliber pistol;

In violation of Title 18, United States Code, Sections 922(o), 921(a), and 924(a)(2), and Title 26, United States Code, Section 5845(b).

COUNT 7

THE GRAND JURY FURTHER CHARGES:

On or about December 5, 2022, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, knowingly possessed a firearm, which is a machinegun, in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Sections 924(c)(1)(B)(ii) and 921(a), and Title 26, United States Code, Section 5845(b).

COUNT 8

THE GRAND JURY FURTHER CHARGES:

That on or about December 5 and 6, 2022, in the District of South Carolina, the Defendant, ELIZABETH DELZO JARAMILLO, knowingly did aid and abet the possession and transfer of a machinegun, that is, a fully automatic Glock 19M, 9mm pistol;

In violation of Title 18, United States Code, Sections 922(o), 921(a), 924(a)(2), and 2, and Title 26, United States Code, Section 5845(b).

COUNT 9

THE GRAND JURY FURTHER CHARGES:

That on or about December 6, 2022, in the District of South Carolina, Defendant, ELIZABETH DELZO JARAMILLO, in connection with the acquisition and attempted acquisition of a firearm, that is, a Glock 19M, 9mm pistol from Academy Sports, a licensed dealer, knowingly made a false and fictitious statement on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, which was intended and likely to deceive Academy Sports with respect to a fact material to the lawfulness of the sale and disposition of the firearm to the Defendant, in that the Defendant answered question 21a, that she was the actual transferee/buyer of the firearm indicated on the Form 4473, when in fact as the Defendant then knew, she was not the actual transferee/buyer of the firearm;

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 10

THE GRAND JURY FURTHER CHARGES:

On or about December 6, 2022, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 11

THE GRAND JURY FURTHER CHARGES:

On or about December 6, 2022, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, knowingly did possess and transfer a machinegun, that is, a fully automatic Glock 19M, 9mm pistol;

In violation of Title 18, United States Code, Sections 922(o), 921(a), and 924(a)(2), and Title 26, United States Code, Section 5845(b).

COUNT 12

THE GRAND JURY FURTHER CHARGES:

On or about December 27, 2022, in the District of South Carolina, the Defendants, ESTEBAN COLON PACHECO and ELIZABETH DELZO JARAMILLO, intentionally and unlawfully did possess with intent to distribute and did distribute 50 grams or more of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 13

THE GRAND JURY FURTHER CHARGES:

On or about December 30, 2022, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, knowingly did possess and transfer a machinegun, that is, a fully automatic Glock 23, .40 caliber pistol;

In violation of Title 18, United States Code, Sections 922(o), 921(a), and 924(a)(2), and Title 26, United States Code, Section 5845(b).

COUNT 14

THE GRAND JURY FURTHER CHARGES:

On or about February 16, 2023, in the District of South Carolina, the Defendant, ELIZABETH DELZO JARAMILLO, intentionally and unlawfully did possess with intent to distribute a quantity of methamphetamine and a quantity of cocaine, both Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 15

THE GRAND JURY FURTHER CHARGES:

On or about February 16, 2023, in the District of South Carolina, the Defendant, ELIZABETH DELZO JARAMILLO, knowingly possessed a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 16

THE GRAND JURY FURTHER CHARGES:

On or about March 24, 2023, in the District of South Carolina, the Defendant, WILLIAM JOSE MANUEL CASTILLO, intentionally and unlawfully did possess with intent to distribute and did distribute 50 grams or more of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 17

THE GRAND JURY FURTHER CHARGES:

On or about March 25, 2023, in the District of South Carolina, the Defendant, ESTEBAN COLON PACHECO, intentionally and unlawfully did possess with intent to distribute and did distribute 50 grams or more of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 18

THE GRAND JURY FURTHER CHARGES:

That on or about June 22, 2023, in the District of South Carolina, the Defendant, CHRISTIAN VALENTIN CRUZ, knowingly possessed a firearm, that is, an Anderson Manufacturing AM-15 300 AAC caliber rifle, having a barrel of less than 16 inches in length, not registered to him in the National Firearms Registration and Transfer Record;

In violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

FORFEITURE

FIREARM/DRUG OFFENSES:

Upon conviction for felony violations of Title 18, 21 and 26, United States Code as charged in this Indictment, the Defendants, ESTEBAN COLON PACHECO, WILLIAM MANUEL CASTILLO, ELIZABETH DELZO JARAMILLO, CHRISTIAN VALENTIN CRUZ, and WILMARI RODRIGUEZ GONZALEZ, shall forfeit to the United States all of the Defendants' rights, title, and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
 - (2) involved in or used in any knowing violation of 18 U.S.C. §§ 922 or 924, 26 U.S.C. §§ 5841 or 5861, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

PROPERTY:

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, Title 26, United States Code, Section 5872, Title 49, United States Code, Section 80303 and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Indictment includes, but is not limited to, the following:

A. Firearms:

- (1) SCCY CPX-2, 9mm pistol
Serial Number: SCR-882836
Seized From: Elizabeth Delzo Jaramillo
Seizure Date: February 16, 2023
- (2) Anderson Manufacturing AM-15, NFA firearm, short barrel rifle
Serial Number: 214 54649
Seized From: The residence of Elizabeth Delzo Jaramillo, Christian Valentin Cruz and Wilmari Rodriguez Gonzalez
Seizure Date: June 22, 2023
- (3) Glock, Model 30, .45 ACP pistol
Serial Number: RUG415
Seized From: The residence of Elizabeth Delzo Jaramillo, Christian Valentin Cruz and Wilmari Rodriguez Gonzalez
Seizure Date: June 22, 2023
- (4) Palmetto State Armory, PSAK47, 7.62x39 caliber rifle
Serial Number: AKB064040
Seized From: The residence of Elizabeth Delzo Jaramillo, Christian Valentin Cruz and Wilmari Rodriguez Gonzalez
Seizure Date: June 22, 2023
- (5) DPMS, A-15, 5.56 caliber rifle
Serial Number: F066301K
Seized From: The residence of Elizabeth Delzo Jaramillo, Christian Valentin Cruz and Wilmari Rodriguez Gonzalez
Seizure Date: June 22, 2023

- (6) Diamondback, DB15, 5.56 caliber rifle
Serial Number: DB2038022
Seized From: The residence of Elizabeth Delzo Jaramillo,
Christian Valentin Cruz and Wilmari Rodriguez Gonzalez
Seizure Date: June 22, 2023
- (7) Scorpion EVO 3S1, 9mm pistol
Serial Number: G040425
Seized From: The residence of Elizabeth Delzo Jaramillo,
Christian Valentin Cruz and Wilmari Rodriguez Gonzalez
Seizure Date: June 22, 2023

B. Ammunition/Magazines:

- (1) Miscellaneous rounds of assorted ammunition
- (2) Handgun magazines

C. Proceeds/Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug offenses charged in the Indictment, and all interest and proceeds traceable thereto as a result of their violations of 21 U.S.C. §§ 841 and 846.

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the Defendants up to an amount equivalent to the value of the above-described forfeitable property;

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, Title 26, United States Code, Section 5872, Title 49, United States Code, Section 80303 and Title 28, United States Code, Section 2461(c).

A True BILL

REDACTED
FOREPERSON

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